

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	
)	Docket No. 16-CR-40025-TSH
(1) IVAN CRUZ-RIVERA and)	
(2) CARLOS JIMENEZ)	
)	
Defendants.)	

Government's Amended Exhibit List (11/30/18)

	Description
1.01	N-45 (audio / video recording from UC vehicle on 10/4/2013) (00224) – edited version with captions
1.02	N-45 (audio / video recording from UC vehicle on 10/4/2013) (00224) – edited version without captions
2	Transcript / Translation of N-45 (01713-52) – edited version
3.01	N-46 (audio / video recording from CS's person on 10/4/2013) (00225) – edited version with captions
3.02	N-46 (audio / video recording from CS's person on 10/4/2013) (00225) – edited version without captions
4	Transcript / Translation of N-46 (01753-97) – edited version
5	DEA Exhibit 12 (heroin purchased by CS from SG 10/4/2013)
6	DEA Form 7 and Laboratory Report relating to Exhibit 12 (00048, 02144)
7	Traffic Citation issued to Carlos Jimenez on 10/4/2013 (01408-09)
8	Photograph #1 of money and cell phones seized from NJ Lexus (00189)
9	Photograph #2 of money seized from NJ Lexus (00190)
10.01	Verizon Wireless bills for Segundo Gutierrez (978-868-3324) (01574-90; 01608-29)
10.02	Verizon Wireless Excel records (01650-54)
11	Verizon Wireless bills for Christine Jimenez (732-887-2581) (01553-62)
12	Certificate of Authenticity for Verizon Wireless records (01647)
13.01	Tracfone Wireless records for 787-222-8866 (01515-17)

13.02	Tracfone Wireless records for 787-222-8866 (01962-2061)
13.03	Certificate of Authenticity for Tracfone Wireless records for 787-222-8866 (01960)
14.01	WhatsApp Messages from Segundo Gutierrez phone with 787-222-8866 (01663-67)
14.02	WhatsApp Messages – Edited Version featuring English translations
15	Transcript / Translation of WhatsApp Messages from Segundo Gutierrez phone with 787-222-8866 (01863-68)
16	CV for Senior Forensic Chemist Vadim Astrakhan (01446-47)
17	Recorded telephone call from Segundo Gutierrez made from prison in FL to Ivan Cruz-Rivera 12/1/2014 at 10:20 am (00223)
18	Transcript / Translation of 12/1/2014 call at 10:20 am (01826-39)
19	Recorded telephone call from Segundo Gutierrez made from Wyatt to Ivan Cruz-Rivera's agent 7/15/2015 at 3:48 pm (00216)
20	Transcript / Translation of 7/15/2015 call at 3:48 pm (01845-50)
21	Wyatt Call Detail Report for 7/15/2015 (00214-15)
22	Recorded telephone call from Segundo Gutierrez made from Wyatt to Ivan Cruz-Rivera 7/21/2015 at 1:06 pm (00221)
23	Transcript / Translation of 7/21/2015 call at 1:06 pm (01851-54)
24	Recorded telephone call from Segundo Gutierrez made from Wyatt to Ivan Cruz-Rivera 7/21/2015 at 5:13 pm (00220)
25	Transcript / Translation of 7/21/2015 call at 5:13 pm (01855-62)
26	Wyatt Call Detail Report for 7/21/2015 (00216-17)
27	BOP records relating to calls from Segundo Gutierrez (00236-239)
28	Recording with dispatch from 10/4/2013 car stop (00914)
29	Photograph of Ivan Cruz-Rivera identified by Segundo Gutierrez (00088)
30	Photograph of Carlos Jimenez identified by Segundo Gutierrez (00089)
31	Photographs of 105/107 Union Street January 2014 (01679-89)
32	CV for Trooper Felipe Martinez (01448-50)
33	N-85 Receipt from Ivan Cruz Rivera to Raquel Flores for \$2000 (00177)
34	N-84 Envelope from Agustin Flores to Segundo Gutierrez (00177)
35	Photocopy of (2) \$1000 money orders send to Segundo Gutierrez by Agustin Flores (00178)

36	Rule 5 documents signed by Ivan Cruz-Rivera
37	City of Jersey City Department of Public Safety records for Carlos Jimenez (00195-97)
38	New Jersey Motor Vehicle Commission records relating to NJ Lexus bearing registration D17CLD (02145-69)
39	Segundo Gutierrez Cooperation Agreement (00895-99)
40	Detection Records relating to Jari (00271-451)
41	Training Records relating to Jari (00452-881)
42	Certification Records for Trooper Patrick Robinson and K-9 Jari (00882-83)
43	N-48 (consensually recorded telephone call on 10/14/2013) (00226)
44	Transcript / Translation of N-48 (01798-806)
45	N-49 (audio / video recording of meeting on 10/22/2013) (00227)
46	Transcript / Translation of N-49 (01807-21)
47.01	Documents submitted by Ivan Cruz-Rivera to Worcester County District Attorney's Office making claim against \$44,000 seized (00094-100 and 00179-84)
47.02	Documents submitted by Ivan Cruz-Rivera to Worcester County District Attorney's Office making claim against \$44,000 seized (00094-100 and 00179-84)
48	Statement of Ivan Cruz-Rivera regarding \$44,000 seized (00093)

The government reserves the right to supplement this list with additional exhibits identified in the discovery or as the need to call additional witnesses becomes clear during trial preparation.

Respectfully submitted,

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Dated: November 30, 2018

CERTIFICATE OF SERVICE

This is to certify that I have served counsel of record for the Defendant a copy of the foregoing document by ECF.

/s/ Michelle L. Dineen Jerrett

MICHELLE L. DINEEN JERRETT

Assistant U.S. Attorney

Dated: November 30, 2018